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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THERESA M. WEESNER,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

)  
) Case No. 2:16-cv-02018-RFB-PAL

) **JOINT STIPULATION AND [PROPOSED]**  
) **ORDER FOR EXTENSION OF TIME TO FILE**  
) **DEFENDANT'S NOTICE OF VOLUNTARY**  
) **REMAND OF THE CASE OR CROSS-**  
) **MOTION TO AFFIRM**

)  
) **(Third Extension Request)**

Plaintiff Theresa M. Weesner (Plaintiff) and Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (Defendant), stipulate, with the approval of this Court, to an extension of time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To Affirm by one week from the current deadline of February 20, 2017 to **February 27, 2017**, with all

1 other dates in this Court's Order Concerning Review Of Social Security Cases extended accordingly.  
2 This is Defendant's third request for an extension.

3       Good cause exists to grant Defendant's request for extension. Counsel needs additional time to  
4 make time for the agency's review process for new attorneys, which requires additional levels of  
5 review. Due to scheduling conflicts and the upcoming President's Day holiday, Counsel will not be  
6 able to complete the agency's review process in time for the current deadline.  
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Defendant makes this request in good faith with no intention to unduly delay the proceedings.  
Plaintiff has no objection and has stipulated to the requested relief.

Respectfully submitted this 17<sup>th</sup> day of February 2017,

Date: February 17, 2017

By: /s/\*Howard Olinsky  
Howard D. Olinsky  
\*by email authorization on 2/17/17  
Attorney for Plaintiff

Date: February 17, 2017

DANIEL G. BOGDEN  
United States Attorney  
HOLLY A. VANCE  
Assistant United States Attorney


By: /s/Tina L. Naicker  
TINA L. NAICKER  
Special Assistant United States Attorney

**[PROPOSED] ORDER**

For good cause appearing therein, IT IS HEREBY ORDERED that the Joint Stipulation for Extension of Time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To Affirm is GRANTED. Defendant shall file its response to Plaintiff's Motion on or before **February 27, 2017**. All other deadlines shall be extended accordingly.

**IT IS SO ORDERED.**

Dated: February 22, 2017

  
THE HONORABLE PEGGY A. LEEN  
United States Magistrate Judge

**CERTIFICATE OF SERVICE**

I, TINA L. NAICKER, certify that the following individual was served with a copy of the **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE DEFENDANT'S NOTICE OF VOLUNTARY REMAND OF THE CASE OR CROSS-MOTION TO AFFIRM** on the date and via the method of service identified below:

**CM/ECF:**

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Respectfully submitted this 17th day of February 2017,

/s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant United States Attorney  
  
Attorney for Defendant